

UST SECTION
June 10, 2004

MEMORANDUM

TO: Permits and Inspection Branch

FROM: Ruth Strauss, Branch Head *RS*

SUBJECT: Withdrawal of State's Approval for use of Cathodic Protection Suitability Study (CPSS) and Mean Age to Corrosion Failure (MACF) as Alternative Integrity Assessment Methods for Underground Storage Tanks

This is to notify you that the UST Section has withdrawn its approval of CPSS and MACF for use as alternative methods for assessing the structural integrity of unlined steel tanks prior to upgrading with corrosion protection. In 1996, pursuant to federal regulation 40 CFR 280.21(b)(2)(iv) as incorporated by state rule 15A NCAC 2N .0302, the UST Section granted its approval of CPSS and MACF as methods for determining if unlined steel USTs were suitable for upgrading with corrosion protection. As stipulated in the approval letters of April 1996 (CPSS) and June 1996 (MACF), the approvals were valid only if certain conditions were met. Because the December 22, 1998 upgrade deadline has long since passed diminishing the need for integrity assessments of unlined steel tanks and because CPSS and MACF were often not performed in accordance with the state's conditions for approval, these methods are no longer valid in the state of North Carolina.

Lab One Analytical, Inc. was the company that requested approval for CPSS and SUBCON, Inc. requested approval of MACF. Lab One Analytical, Inc. cannot be located and Subcon, Inc. is no longer in business. Therefore, this memo serves to document the State's withdrawal of approval for use of these methods as alternative integrity assessments.

cc: Grover Nicholson